Los Alamos
NATIONAL LABORATORY

memorandum

Office of Equal Opportunity

To/MS: T. Babicke, HR, P124
From/MS: P. Trujillo, OEO, C329
Phone/Fax: 7-9989/7-8720
Symbol: OEO
Date: November 12, 2003

Draft Code of Ethics

The first Code of Ethics Review Team, named by the D/AAB, reviewed the "Response on the Draft Code of Ethics" report prepared by Workforce Data Analysis (HR-WDA) (attached). The team looked at the employee comments related to the content of the code and placed them in specific categories as they related to each of the code principles. After considering employee remarks, the Code of Ethics Review Team suggests the following changes to the draft code of ethics (see chart below). The chart identifies the draft code of ethics as it went out to employees for comment in one column and proposed changes in the second column.

Draft Code	Proposed Changes
Consistent with the fundamental principles of honesty and fairness, we, in all our interactions, demonstrate service to the nation, integrity and openness, passion for excellence and innovation, personal accountability, respect for others, and teamwork. This is our foundation.	**Consistent with the fundamental principles of honesty and fairness, we, in all our interactions, demonstrate service to the nation, integrity and <u>candor</u>, passion for excellence and innovation, personal accountability, respect for others, and teamwork. This is our foundation.**
We recruit and develop the best-qualified people, recognizing that inclusiveness and diversity are essential to our success We acknowledge that a range of perspectives is essential for success in our scientific and business endeavors. We recognize that we have a shared fate and that we must all succeed together. We treat each other with mutual respect and common courtesy.	We recruit and develop the best-qualified people. **<u>We recognize that inclusiveness and diversity are essential to our success</u>.** We acknowledge that a range of perspectives is essential for success in our scientific and business endeavors. We recognize that we have a shared fate and that we must all succeed together. We treat each other with mutual respect and common courtesy.
We are good stewards of our customers' funds and resources while ensuring that all business transactions are executed in compliance with applicable laws and regulations and the requirements of the DOE/UC Prime Contract.	We are good stewards of our customers' funds and resources. **<u>We adhere to all applicable laws and regulations and the requirements of the DOE contract.</u>**
We make technical decisions and provide information to our sponsors that are based on solid scientific study and analysis. We conduct all research with the highest integrity, in accordance with recognized standards of scientific	No Change.

method. We recognize that peer review is an essential component of maintaining scientific excellence, and we will apply such reviews as appropriate. We recognize and acknowledge those who have contributed to the research we conduct.	
We do not compromise safety or security for personal, programmatic, or operational needs. We accept responsibility to work safely and to watch out for the safety of each other. We act to maintain appropriate security.	**We do not compromise safety or security for personal, programmatic, or operational needs.**
We minimize risks to public health and the environment, considering the needs and well being of the surrounding communities. We respect and enhance the natural environment and cultural resources. We apply our expertise to the benefit of the region, nation, and world.	**We minimize risks to public health and the environment, respecting the needs and well being of the surrounding communities.**

The team also discussed emerging themes garnered from the employee comments. The themes are listed below in blue with **suggested** implementation tactics to address the themes.

The code of ethics must cascade from senior management to the Lab population
- o The code of ethics should not be implemented without demonstrated Laboratory management ownership.
  - ▪ Director Nanos holds a special Senior Executive Team (SET) meeting to kick-off the ethics program by all SET members
  - ▪ SET members cascade to division leaders (DLs) and DLs to cascade code of ethics to group leaders (GLs) with deadline for signing IPOs

Director Nanos must take an active role in the implementation of the code of ethics
- o Director Nanos holds a special SET meeting to kick-off the ethics program
- o SET members cascade to DLs and DLs to cascade code of ethics to GLs with deadline for signing IPOs
- o Director Nanos should hold an all-employee meeting kicking off the ethics program and make distribution of the code of ethics to division offices

Management must model behaviors for the code of ethics to succeed
- o Code of ethics is a topic in training modules designed for managers
- o Include the code as IPO requirement with yearly assessment

There must be visible management commitment – holding managers accountable
- o Director Nanos holds a special SET meeting to kick-off the ethics program

- o SET members cascade to DLs and DLs to cascade code of ethics to GLs with deadline for signing IPOs
- o Newsbulletin article, photos

The code of ethics is a tool to guide personal accountability
- o Deviations from the code of ethics should be addressed through current progressive discipline and conflict resolution policies

Violations of the code of ethics should be addressed and the results of any action taken communicated, if possible
- o Appropriate action should be taken based upon the specific conduct. Deviations from the code of ethics should be addressed through current progressive discipline and conflict resolution policies

Administration of code of ethics needs an oversight body/office/person
- o An "Ethics Board" should be created. An ethics expert from the Laboratory's contract oversight organization should chair it. The board should have five positions, including the chair. Board members should be selected from a pool of Laboratory and University of California employees. HEERA considerations must be addressed.

There is a need for ethics training at all levels
- o Director Nanos should hold an all-employee meeting to kick off the ethics program. At this time, an external expert initiates ethics training, it is taped and distributed to all divisions
- o Contract with an external ethics expert to provide training at the all levels
- o Produce poster-sized visuals for distribution to all group offices
- o Produce badge-sized visuals for distribution to all employees
- o Required management discussions with all direct reports on at least yearly
- o Require quarterly management walkarounds that focus on ethics issues